

**IN THE UNITED STATES DISTRICT COURT FOR
THE SOUTHERN DISTRICT OF NEW YORK**

REYNOLDS CONSUMER PRODUCTS LLC; and
SOUTHWIRE COMPANY, LLC,

Plaintiffs,

v.

GLENCORE AG; GLENCORE, LTD.; GLENCORE
INTERNATIONAL AG; GOLDMAN SACHS &
CO.; GOLDMAN SACHS INTERNATIONAL;
HENRY BATH LLC; J. ARON & COMPANY;
JPMORGAN CHASE BANK, N.A.; JP MORGAN
SECURITIES PLC; METRO INTERNATIONAL
TRADE SERVICES, LLC; MITSU HOLDINGS LLC;
ACCESS WORLD (USA) LLC; ACCESS WORLD
AG; and ACCESS WORLD (VLISSINGEN) BV.

Defendants.

Case No. 1:16-cv-5955

**THE HONORABLE
KATHERINE B. FORREST**

**PLAINTIFFS' NOTICE OF
MOTION TO RECONSIDER
THE COURT'S OCTOBER 5,
2016 ORDER DISMISSING
PLAINTIFFS' COMPLAINT
AND AMEND THE JUDGMENT**

PLEASE TAKE NOTICE that, pursuant to Rule 59(e) of the Federal Rules of Civil Procedure and Local Rule 6.3, Plaintiffs Reynolds Consumer Products LLC and Southwire Company, LLC (collectively, "Plaintiffs") hereby move this Court, before the Honorable Judge Katherine B. Forrest, United States District Judge for the Southern District of New York—Daniel Patrick Moynihan Courthouse, 500 Pearl Street, Courtroom 15A, New York, New York 10007—to reconsider the Court's October 5, 2016 Order dismissing Plaintiffs' Complaint and amend the judgment.

Dated: October 19, 2016
New York, New York

Respectfully submitted,

LOUIS F. BURKE, P.C.

By: /s/Leslie Wybiral
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Attorneys for Plaintiffs
Admitted Pro Hac Vice

CERTIFICATE OF SERVICE

I hereby certify that on October 19, 2016, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the email addresses denoted on the Electronic Mail Notice List.

I certify under the laws of the United States of America that the foregoing is true and correct.

Dated: October 19, 2016
New York, New York

/s/Leslie Wybiral
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